



State of Arizona  
Department of Education

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**MEMORANDUM**

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**TO:** National School Lunch Program (NSLP) Sponsors

**FROM:** Mary Szafranski, Deputy Associate Superintendent  
Arizona Department of Education, Health & Nutrition Services

Cara Peczkowski, Director  
Arizona Department of Education, School Nutrition Programs

**DATE:** November 10, 2011

**RE:** Verification Procedures and Reporting Requirements of Foster Children

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*Original Signed*

This purpose of this memorandum is to provide guidance on the verification process and reporting requirements for categorically eligible foster children. Historically, foster children applied for free meals as a household of one based on their own income, if any. For the verification process and reporting, the application was treated as an income based application. Now, foster children are categorically eligible and the verification process and reporting requirements must be modified to accommodate this change. Additionally, since a foster child's free status is not extended to the other children in the household, the procedures for the verification process and reporting requirements need clarification.

Local Educational Agencies (LEAs) must use the following procedures to verify and report foster children in the Verification Summary Report.

**Determining the Verification Application Pool:**

**Foster Children who are Directly Certified**

Foster children may be identified and certified as free eligible through the Department of Economic Security Administration for Children, Youth, and Families "Notice to Provider – Educational and Medical" form. These foster children will be referred to as "directly certified" for purposes of this memorandum and are not subject to verification if certified through this documentation.



## Foster Children Appearing on an Application

Foster children may be identified and certified as free eligible through an application if they are not directly certified. It is the foster family's choice whether to submit separate applications for the foster child and for the non-foster children in their household or combine all the children on a single application. Both types of applications would be included in the verification pool.

- If a directly certified foster child is listed on an approved application with the non-foster children in the household, that application is considered an **income or case number** application. The application is included in the verification pool, but no eligibility verification is done for the foster child since she/he was directly certified. If the foster child receives any personal income, it must be included on the application and is subject to verification.
- If **separate applications** are submitted and approved for the foster and non-foster children, both applications are included in the verification pool.
  - If the foster child is not directly certified, the foster child is certified as free eligible and the application is considered a categorically eligible application and may be selected for verification when applicable.
  - If a directly certified foster child is on a separate application, the direct certification supersedes the application and therefore the application is disregarded and would not be included in the verification pool.
- If the foster family submits **one application** listing the foster child(ren) and other children in the household, the foster child is certified as categorically eligible and the other children are certified based on income or a valid case number. The application is counted in the verification pool.
  - If the non-foster children are ineligible and the foster child is not directly certified, the foster child is certified as free eligible and the application is considered a categorically eligible application and may be selected for verification when applicable.
  - If the non-foster children are certified eligible for free or reduced-price meals on the basis of income or a valid case number, the application is considered an income or case number application. In addition, if the foster child is not directly certified, the LEA must verify his/her status as well as other eligibility information on the application if that application is selected for verification.

### **Reporting on the Verification Summary Report:**

*Note: For purposes of the Verification Summary Report submitted through CNP Verification, all foster students (not directly certified) and students on case number applications are considered categorically eligible. Categorical eligibility is captured in questions 4c\* and 5a\* of the Verification Summary Report.*

Use the following situations to determine how foster children who are directly certified and foster children found on applications should be reported on the Verification Summary Report through CNP Verification.

**1. Application includes only directly certified foster child(ren):**

As mentioned previously in this memorandum, if an application is submitted for a foster child and attached documentation verifies foster care status (DES Notice to Provider – Educational and Medical form) the foster child is considered directly certified. The foster child would be reported in 4b\*.

**2. Application includes only foster child(ren) who are not directly certified:**

The student(s) AND application must be reported as categorically eligible. The students(s) must be reported in 4c and the application must be reported in 5a.

**3. Application includes both a directly certified foster child(ren) and income eligible students:**

The directly certified foster child(ren) must be reported in 4b. The income eligible student(s) and application must be reported in the appropriate free and reduced-price income eligible questions:

- Students:
  - Free: 4d\*
  - Reduced-price: 6a\*
- Applications:
  - Free: 5b\*
  - Reduced-price: 6c\*

**4. Application includes both a foster child(ren) who is not directly certified and income eligible students:**

The foster child(ren) must be reported in 4c. The income eligible student(s) and application must be reported in the appropriate free and reduced-price income eligible questions:

- Students:
  - Free: 4d
  - Reduced-price: 6a
- Applications:
  - Free: 5b
  - Reduced-price: 6c

If the other children on the application are determined to be ineligible due to not meeting the income requirements, then the foster child must be reported in 4c and the application

must be reported in 5a. Since the other children on the application do not qualify for benefits, the application is tied to the foster child.

**5. Application includes both a directly certified foster child(ren) and student(s) that provide a SNAP/TANF/FDPIR case number:**

The directly certified foster child must be reported in 4b. The case number student(s) must be reported in 4c and the application must be reported in 5a.

**6. Application includes both a foster child(ren) not directly certified and student(s) that provide a SNAP/TANF/FDPIR case number:**

If a foster child is included on an application with other non-foster child(ren) certified through a SNAP/TANF/FDPIR case number, all students must be reported in 4c and the application must be reported in 5a.

**\*Here are the full-length questions found in the Verification Summary Report that are referenced in this memorandum:**

4b. Number of **Students** approved as Free Eligible who are not subject to verification

4c. Number of **Students** approved as Free Eligible based on a SNAP, Cash Assistance, or FDPIR case number on an application

4d. Number of **Students** approved as Free Eligible based on income/household size information submitted on an application

5a. Number of **Applications** approved as Free Eligible based on a SNAP, Cash Assistance, or FDPIR case number submitted on an application

5b. Number of **Applications** approved as Free Eligible based on income/household size information submitted on an application

6a. Total number of **Students** reported as Reduced Price Eligible

6c. Total number of **Applications** reported as Reduced Price Eligible

For questions regarding this memorandum, please contact your School Nutrition Programs Specialist at (602) 542-8700.

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